

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 18-30021-MJR
)	
EMMANUEL D. ABDON,)	
)	
Defendant.)	

**GOVERNMENT'S MOTION PURSUANT TO THE CHILD VICTIMS' AND CHILD
WITNESSES' RIGHTS ACT**

Comes now the United States of America, by and through its attorneys, Donald S. Boyce, United States Attorney for the Southern District of Illinois, and Angela Scott, Assistant United States Attorney, and, in support of its Motion Pursuant to the Child Victims' and Child Witnesses' Rights Act (the "Act"), states as follows:

Defendant Abdon is charged with Enticement of a Minor and Travel with Intent to Engage in Illicit Sexual Conduct. There are two minors involved in the case, the victim (A.F.) and the minor who reported the crime (K.S.). Both minors are entitled to certain rights pursuant to the Child Victims' and Child Witnesses' Rights Act, located at Title 18, United States Code, Section 3509. One of these rights is the right to privacy. 18 U.S.C. §3509(d). The Act provides for various measures that may be taken to protect the name or other personal information of a minor victim or witness, including filing documents under seal, seeking protective orders, and "any other measures that may be necessary to protect the privacy of the child." To this end, the undersigned AUSA has only provided defense counsel with documents relating to the minor victim and witness that have been redacted to show only their initials. In addition, the Government has redacted the last names of the parents of the minors if the last name is the same as that of the minor.

It is anticipated that both A.F. and K.S. will have to testify at trial. The use of only the

minors' initials will ensure that they be treated with respect for their privacy by protecting their identity from the members of the jury, audience members, and any members of the press who might be present. Moreover, the minors' real names are not crucial to this case, so it will not be prejudicial to the defendant.

WHEREFORE, the Government respectfully requests that this Court direct all counsel, with respect to both court filings and all court proceedings, to only refer to the minors by the initials of their first and last names, and not to otherwise reveal their identities, pursuant to the Child Victims' and Child Witnesses' Rights Act.

Respectfully submitted,

DONALD S. BOYCE
United States Attorney

s/ *Angela Scott*
ANGELA SCOTT
Assistant United States Attorney
Nine Executive Drive
Fairview Heights, IL 62208
(618) 628-3700 (office)
(618) 628-3730 (fax)
E-mail: Angela.Scott@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 18-30021-MJR
)	
EMMANUEL D. ABDON,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2018, I electronically filed the **Government's Motion Pursuant to the Child Victims' and Child Witnesses' Rights Act** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

AFPD Daniel G. Cronin

Respectfully submitted,

DONALD S. BOYCE
United States Attorney

s/ *Angela Scott*
ANGELA SCOTT
Assistant United States Attorney
Nine Executive Drive
Fairview Heights, IL 62208
(618) 628-3700 (office)
(618) 628-3730 (fax)
E-mail: Angela.Scott@usdoj.gov